

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS

Domain Protection LLC	§	
	§	
Plaintiff	§	
	§	Civil Action No. 3:15-cv-02244-L
v.	§	
	§	
Paul Raynor Keating	§	
	§	
Defendant	§	

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**DEFENDANT’S RENEWED MOTION TO DISMISS**

Defendant Paul Raynor Keating (“Defendant Keating”) files this *Renewed Motion to Dismiss* pursuant Rule 12(b)(2) and 12(b)(6), FED. R. CIV. P., and respectfully requests that the Court dismiss all claims without prejudice on the basis of Defendant Keating’s original and pending *Motion to Dismiss* [Dkt No. 6]. The Renewed Motion to Dismiss is supported by the more detailed Memorandum in Support thereof and states the following:

As set forth in the Memorandum, Plaintiff’s Complaint fails to establish personal jurisdiction over the Defendant, who is in any event, protected by the immunity afforded by the Texas Citizen Protection Act and federal case law.

WHEREFORE, Defendant Keating respectfully requests that the Court dismiss this action without prejudice.

Respectfully submitted,

GRAY REED & MCGRAW, P.C.

By: /s/ Travis Crabtree  
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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served through ECF on this 2<sup>nd</sup> day of September, 2015:

/s/ Travis Crabtree  
TRAVIS CRABTREE